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September 23, 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Federal Communications Commission
Washington, D.C. 20554

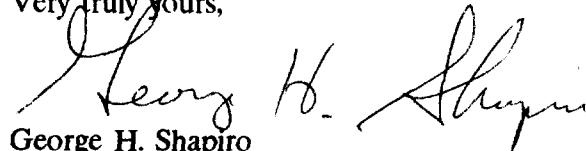
Stop Code: 1170-B

Re: MM Docket No. 93-232

Dear Mr. Caton

Transmitted herewith on behalf of Viacom International Inc. is the original signed declaration of George Franciscovich, a copy of which was submitted as Exhibit 4 to the "Comments of Viacom International Inc." filed on September 22, 1992, with respect to MM Docket No. 93-232. We request that Mr. Franciscovich's original signed declaration be associated with that filing.

Very truly yours,


George H. Shapiro

cc: A. Wray Fitch III, Esq. (w/enc.)

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DECLARATION OF GEORGE FRANCISCOVICH

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

I, George Franciscovich, declare under penalty of perjury as follows:

1. I am Vice President, Counsel/Cable for Viacom International Inc. ("Viacom") I am responsible for legal matters for Viacom Cable, the division of Viacom that has its headquarters located in Pleasanton, California and oversees the operation of Viacom's cable television systems. As part of that responsibility I am involved in the determination of which broadcast television stations would be entitled to must carry status on the cable television systems in the San Francisco-Oakland-San Jose ADI, and am familiar with the broadcast programming of stations in the San Francisco-Oakland-San Jose ADI, including station KFCB-TV, Concord, and station KLXV-TV, San Jose.

2. In connection with the implementation of the FCC's new must-carry rules, Viacom Cable analyzed the programming schedules of KFCB-TV and KLXV-TV during the period between May 16 and May 22, 1993, for purposes of determining whether the stations were "substantially duplicative" under the FCC's must-carry rules. The stations' program schedules for that period, which are attached hereto as Appendix A, reflected that with very few exceptions the stations ran the same programming. Further, in a letter to Viacom Cable dated July 12, 1993, KLXV-TV represented that 73.97% of its weekend programming qualifies as "substantially duplicative" of KFCB-TV's programming under the FCC's must-carry rules. It may well be that one or both of the stations have time-shifted their

programming to avoid qualifying as "substantially duplicative" stations for purposes of must-carry.

3. In addition, when viewing KFCB-TV I have observed that during KFCB-TV's over-the-air solicitations for contributions, the call signs and telephone numbers of both KFCB-TV and KLXV-TV are superimposed on the screen, and that KFCB-TV appears to run little commercial advertising.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

9/22/93
Date


George Franciscovich

APPENDIX A

VIACOM CABLE

MAY 16, 1993 - MAY 22, 1993 KLXV

1800	05/17/93	KLXV	0060	{ 137-93 } 700 Club
1800	05/18/93	KLXV	0060	{ 138-93 } 700 Club
1800	05/19/93	KLXV	0060	{ 139-93 } 700 Club
1800	05/20/93	KLXV	0060	{ 140-93 } 700 Club
1800	05/21/93	KLXV	0060	{ 141-93 } 700 Club
0700	05/17/93	KLXV	0030	Accent on Health
2130	05/17/93	KLXV	0030	Accent on Health
1630	05/19/93	KLXV	0030	Accent on Health
1200	05/22/93	KLXV	0030	Accent on Health
1600	05/17/93	KLXV	0060	Act It Out
1400	05/22/93	KLXV	0060	Act It Out
1300	05/16/93	KLXV	0060	Adrian Rogers
0830	05/16/93	KLXV	0030	Amazing Facts
1000	05/22/93	KLXV	0030	America's Backyard
1600	05/20/93	KLXV	0030	Appointment With Destiny
2330	05/22/93	KLXV	0030	Appointment With Destiny
1530	05/21/93	KLXV	0030	Becky's Barn
0730	05/22/93	KLXV	0030	Becky's Barn
1130	05/17/93	KLXV	0030	Benny Hinn
1130	05/18/93	KLXV	0030	Benny Hinn
1130	05/19/93	KLXV	0030	Benny Hinn
1130	05/20/93	KLXV	0030	Benny Hinn
1130	05/21/93	KLXV	0030	Benny Hinn
0600	05/17/93	KLXV	0030	Beverly Exercise
0830	05/17/93	KLXV	0030	Beverly Exercise
0600	05/18/93	KLXV	0030	Beverly Exercise
0830	05/18/93	KLXV	0030	Beverly Exercise
0600	05/19/93	KLXV	0030	Beverly Exercise
0830	05/19/93	KLXV	0030	Beverly Exercise
0600	05/20/93	KLXV	0030	Beverly Exercise
0830	05/20/93	KLXV	0030	Beverly Exercise
0600	05/21/93	KLXV	0030	Beverly Exercise
0830	05/21/93	KLXV	0030	Beverly Exercise
0600	05/22/93	KLXV	0030	Body by Janis
1200	05/17/93	KLXV	0030	Bountiful Blessing
1200	05/18/93	KLXV	0030	Bountiful Blessing
1200	05/19/93	KLXV	0030	Bountiful Blessing
1200	05/20/93	KLXV	0030	Bountiful Blessing
1200	05/21/93	KLXV	0030	Bountiful Blessing
2030	05/16/93	KLXV	0030	Breath of Life
1500	05/16/93	KLXV	0030	Breath of the Spirit
1730	05/22/93	KLXV	0030	Buenas Nuevas
1330	05/22/93	KLXV	0030	Butterfly Island
1530	05/17/93	KLXV	0030	Captain Hook
2300	05/16/93	KLXV	0030	Carlton Pearson
0700	05/18/93	KLXV	0030	Celebrate Life
1800	05/22/93	KLXV	0030	Challenge America
1630	05/20/93	KLXV	0030	Choices We Face
0630	05/16/93	KLXV	0030	Christopher Closeup
1000	05/17/93	KLXV	0060	Coast to Coast
1400	05/17/93	KLXV	0060	Coast to Coast
2200	05/17/93	KLXV	0060	Coast to Coast
1000	05/18/93	KLXV	0060	Coast to Coast
1400	05/18/93	KLXV	0060	Coast to Coast
2200	05/18/93	KLXV	0060	Coast to Coast
1000	05/19/93	KLXV	0060	Coast to Coast
1400	05/19/93	KLXV	0060	Coast to Coast
2200	05/19/93	KLXV	0060	Coast to Coast
1000	05/20/93	KLXV	0060	Coast to Coast
1400	05/20/93	KLXV	0060	Coast to Coast
2200	05/20/93	KLXV	0060	Coast to Coast
1000	05/21/93	KLXV	0060	Coast to Coast
1400	05/21/93	KLXV	0060	Coast to Coast
2200	05/21/93	KLXV	0060	Coast to Coast
1700	05/22/93	KLXV	0030	Compartiendo el Pan de la Vida
1200	05/16/93	KLXV	0060	Cornerstone
1230	05/21/93	KLXV	0030	Cornerstone
0630	05/22/93	KLXV	0030	Davey & Goliath
0800	05/22/93	KLXV	0030	Davey & Goliath
2100	05/22/93	KLXV	0030	Day of Discovery
0700	05/20/93	KLXV	0030	Dean and Mary Brown
1630	05/21/93	KLXV	0030	Design for Discipleship
0800	05/17/93	KLXV	0030	Didache -- Teachings of Christ
0800	05/18/93	KLXV	0030	Didache -- Teachings of Christ
0800	05/19/93	KLXV	0030	Didache -- Teachings of Christ

0800	05/20/93	KLXV	0030	Didache -- Teachings of Christ
0800	05/21/93	KLXV	0030	Didache -- Teachings of Christ
2200	05/16/93	KLXV	0030	Dwight Thompson
1300	05/21/93	KLXV	0030	Especially for You
1800	05/16/93	KLXV	0060	Frederick K. Price
1600	05/22/93	KLXV	0030	Golf Dynamics
1100	05/22/93	KLXV	0030	Graham Kerr's Simply Marvellous
1630	05/18/93	KLXV	0030	Guidelines
0730	05/16/93	KLXV	0030	In Search of the Lord's Way
2100	05/16/93	KLXV	0060	In Touch
1400	05/16/93	KLXV	0060	Informed Viewer
1500	05/22/93	KLXV	0060	Informed Viewer
1600	05/16/93	KLXV	0030	Irene Houston Ministries
1000	05/16/93	KLXV	0060	Jack Hayford
1300	05/20/93	KLXV	0030	Jack Van Impe
1900	05/22/93	KLXV	0030	Jack Van Impe
1900	05/16/93	KLXV	0060	James Kennedy
0930	05/17/93	KLXV	0030	James Robison
0930	05/18/93	KLXV	0030	James Robison
0930	05/19/93	KLXV	0030	James Robison
0930	05/20/93	KLXV	0030	James Robison
0930	05/21/93	KLXV	0030	James Robison
1600	05/21/93	KLXV	0030	Jerry Barnard
2300	05/22/93	KLXV	0030	Jerry Barnard
2330	05/16/93	KLXV	0030	Jessie Dixon
1300	05/19/93	KLXV	0030	Jessie Dixon
1530	05/16/93	KLXV	0030	Jewish Voice
2030	05/22/93	KLXV	0030	John Ankerberg
1230	05/17/93	KLXV	0030	John Hagee Today
1230	05/18/93	KLXV	0030	John Hagee Today
1230	05/19/93	KLXV	0030	John Hagee Today
1230	05/20/93	KLXV	0030	John Hagee Today
1530	05/19/93	KLXV	0030	Joy Junction
0700	05/22/93	KLXV	0030	Joy Junction
1530	05/20/93	KLXV	0030	Just Kids
0900	05/16/93	KLXV	0030	Kenny Foreman
1100	05/17/93	KLXV	0030	Kenny Foreman
1700	05/17/93	KLXV	0060	Kenny Foreman
1100	05/18/93	KLXV	0030	Kenny Foreman
1700	05/18/93	KLXV	0060	Kenny Foreman
1100	05/19/93	KLXV	0030	Kenny Foreman
1700	05/19/93	KLXV	0060	Kenny Foreman
2100	05/19/93	KLXV	0060	Kenny Foreman
1100	05/20/93	KLXV	0030	Kenny Foreman
1700	05/20/93	KLXV	0060	Kenny Foreman
1100	05/21/93	KLXV	0030	Kenny Foreman
1700	05/21/93	KLXV	0060	Kenny Foreman
1630	05/16/93	KLXV	0030	Key to the Kingdom
0700	05/16/93	KLXV	0030	King Is Coming
2000	05/22/93	KLXV	0030	King Is Coming
0700	05/19/93	KLXV	0030	Larry Lea
0700	05/21/93	KLXV	0030	Larry Lea
0630	05/17/93	KLXV	0030	Life Lessons
1330	05/17/93	KLXV	0030	Life Lessons
0630	05/18/93	KLXV	0030	Life Lessons
1330	05/18/93	KLXV	0030	Life Lessons
0630	05/19/93	KLXV	0030	Life Lessons
1330	05/19/93	KLXV	0030	Life Lessons
0630	05/20/93	KLXV	0030	Life Lessons
1330	05/20/93	KLXV	0030	Life Lessons
0630	05/21/93	KLXV	0030	Life Lessons
1330	05/21/93	KLXV	0030	Life Lessons
1130	05/22/93	KLXV	0030	Lifestyle Magazine
0000	05/18/93	KLXV	0030	LightMusic
0000	05/19/93	KLXV	0030	Lightmusic
0000	05/20/93	KLXV	0030	Lightmusic
0000	05/21/93	KLXV	0030	Lightmusic
0000	05/22/93	KLXV	0030	Lightmusic
0800	05/16/93	KLXV	0030	Lloyd Ogilvie
1300	05/22/93	KLXV	0030	MAC Today
1700	05/16/93	KLXV	0030	New Beginnings
0900	05/22/93	KLXV	0030	Paid Program
0930	05/22/93	KLXV	0030	Paid Program
1030	05/22/93	KLXV	0030	Paid Program
1600	05/19/93	KLXV	0030	Phil Aquilar
1900	05/17/93	KLXV	0120	Praise the Lord
1900	05/18/93	KLXV	0180	Praise the Lord
1900	05/19/93	KLXV	0120	Praise the Lord
1900	05/20/93	KLXV	0180	Praise the Lord
1900	05/21/93	KLXV	0180	Praise the Lord

0830	05/22/93	KLXV	0030	Ouigley's Village
2130	05/22/93	KLXV	0060	Rejoice in the Lord
1100	05/16/93	KLXV	0060	Robert Schuller
1730	05/16/93	KLXV	0030	Ron Cottle
1530	05/18/93	KLXV	0030	Sunshine Factory
1500	05/17/93	KLXV	0030	Superbook
1500	05/18/93	KLXV	0030	Superbook
1500	05/19/93	KLXV	0030	Superbook
1500	05/20/93	KLXV	0030	Superbook
1500	05/21/93	KLXV	0030	Superbook
1600	05/18/93	KLXV	0030	This Is the Life
2000	05/16/93	KLXV	0030	This Week in Bible Prophecy
2100	05/17/93	KLXV	0030	This Week in Bible Prophecy
2330	05/17/93	KLXV	0030	This Week in Bible Prophecy
2330	05/18/93	KLXV	0030	This Week in Bible Prophecy
2330	05/19/93	KLXV	0030	This Week in Bible Prophecy
2330	05/20/93	KLXV	0030	This Week in Bible Prophecy
2330	05/21/93	KLXV	0030	This Week in Bible Prophecy
2230	05/22/93	KLXV	0030	This Week in Bible Prophecy
0900	05/17/93	KLXV	0030	Today With Marilyn Hickey
0900	05/18/93	KLXV	0030	Today With Marilyn Hickey
0900	05/19/93	KLXV	0030	Today With Marilyn Hickey
0900	05/20/93	KLXV	0030	Today With Marilyn Hickey
0900	05/21/93	KLXV	0030	Today With Marilyn Hickey
1230	05/22/93	KLXV	0030	U.S. Farm Report
1830	05/22/93	KLXV	0030	Victorious Living
0730	05/17/93	KLXV	0030	Victory
2300	05/17/93	KLXV	0030	Victory
0730	05/18/93	KLXV	0030	Victory
2300	05/18/93	KLXV	0030	Victory
0730	05/19/93	KLXV	0030	Victory
2300	05/19/93	KLXV	0030	Victory
0730	05/20/93	KLXV	0030	Victory
2300	05/20/93	KLXV	0030	Victory
0730	05/21/93	KLXV	0030	Victory
2300	05/21/93	KLXV	0030	Victory
1630	05/22/93	KLXV	0030	Vision Media
0000	05/16/93	KLXV	0060	Voice of God
2230	05/16/93	KLXV	0030	WWOC Reverend Mark Filkey
1300	05/17/93	KLXV	0030	Witness
1930	05/22/93	KLXV	0030	Worth More Than a Million
1300	05/18/93	KLXV	0030	Zola Levitt

VIACOM CABLE

MAY 16, 1993 - MAY 22, 1993 KFCB

1800	05/17/93	KFCB	0050	{ 137-93 } 700 Club
1800	05/18/93	KFCB	0050	{ 138-93 } 700 Club
1800	05/19/93	KFCB	0050	{ 139-93 } 700 Club
1800	05/20/93	KFCB	0050	{ 140-93 } 700 Club
1800	05/21/93	KFCB	0050	{ 141-93 } 700 Club
0000	05/16/93	KFCB	0050	ACTS: Act It Out
1400	05/22/93	KFCB	0050	ACTS: Act It Out
0700	05/17/93	KFCB	0030	Accent on Health
2330	05/17/93	KFCB	0030	Accent on Health
1900	05/18/93	KFCB	0030	Accent on Health
1630	05/19/93	KFCB	0030	Accent on Health
1200	05/22/93	KFCB	0030	Accent on Health
1300	05/16/93	KFCB	0030	Adrian Rogers
0830	05/16/93	KFCB	0030	Amazing Facts
1000	05/22/93	KFCB	0030	America's Backyard
2330	05/18/93	KFCB	0030	Appointment With Destiny
1600	05/20/93	KFCB	0030	Appointment With Destiny
2330	05/22/93	KFCB	0030	Appointment With Destiny
1500	05/21/93	KFCB	0030	Becky's Barn
1130	05/17/93	KFCB	0030	Benny Hinn
1130	05/18/93	KFCB	0030	Benny Hinn
1130	05/19/93	KFCB	0030	Benny Hinn
1130	05/20/93	KFCB	0030	Benny Hinn
1130	05/21/93	KFCB	0030	Benny Hinn
0600	05/17/93	KFCB	0030	Beverly Exercise
0830	05/17/93	KFCB	0030	Beverly Exercise
0600	05/18/93	KFCB	0030	Beverly Exercise
0830	05/18/93	KFCB	0030	Beverly Exercise
0600	05/19/93	KFCB	0030	Beverly Exercise
0830	05/19/93	KFCB	0030	Beverly Exercise
0600	05/20/93	KFCB	0030	Beverly Exercise
0830	05/20/93	KFCB	0030	Beverly Exercise
0600	05/21/93	KFCB	0030	Beverly Exercise
0830	05/21/93	KFCB	0030	Beverly Exercise
0600	05/22/93	KFCB	0030	Body by Janis
1200	05/17/93	KFCB	0030	Bountiful Blessing
1200	05/18/93	KFCB	0030	Bountiful Blessing
1200	05/19/93	KFCB	0030	Bountiful Blessing
1200	05/20/93	KFCB	0030	Bountiful Blessing
1200	05/21/93	KFCB	0030	Bountiful Blessing
2030	05/16/93	KFCB	0030	Breath of Life
1500	05/16/93	KFCB	0030	Breath of the Spirit
1730	05/22/93	KFCB	0030	Buenas Nuevas
1500	05/17/93	KFCB	0030	Captain Hook
2300	05/16/93	KFCB	0030	Carlton Pearson
1700	05/21/93	KFCB	0030	Carlton Pearson
0700	05/18/93	KFCB	0030	Celebrate Life
1600	05/19/93	KFCB	0030	Celebrate Life
2100	05/17/93	KFCB	0030	Challenge America
1700	05/18/93	KFCB	0030	Challenge America
1800	05/22/93	KFCB	0030	Challenge America
1630	05/20/93	KFCB	0030	Choices We Face
0630	05/16/93	KFCB	0030	Christopher Closeup
1000	05/17/93	KFCB	0060	Coast to Coast
1400	05/17/93	KFCB	0060	Coast to Coast
2000	05/17/93	KFCB	0060	Coast to Coast
1000	05/18/93	KFCB	0060	Coast to Coast
1400	05/18/93	KFCB	0060	Coast to Coast
2000	05/18/93	KFCB	0060	Coast to Coast
1000	05/19/93	KFCB	0060	Coast to Coast
1400	05/19/93	KFCB	0060	Coast to Coast
2000	05/19/93	KFCB	0060	Coast to Coast
1000	05/20/93	KFCB	0060	Coast to Coast
1400	05/20/93	KFCB	0060	Coast to Coast
2000	05/21/93	KFCB	0060	Coast to Coast
1400	05/21/93	KFCB	0060	Coast to Coast
2000	05/21/93	KFCB	0060	Coast to Coast
1700	05/22/93	KFCB	0060	Compartiendo el Pan de la Vida
1200	05/16/93	KFCB	0030	Cornerstone
0630	05/22/93	KFCB	0030	Davey & Goliath
0800	05/22/93	KFCB	0030	Davey & Goliath
2100	05/22/93	KFCB	0030	Day of Discovery
0700	05/20/93	KFCB	0030	Dean and Mary Brown
1630	05/21/93	KFCB	0030	Design for Discipleship

0800	05/17/93	KFCB	0030	Didache -- Teachings of Christ
0800	05/18/93	KFCB	0030	Didache -- Teachings of Christ
0800	05/19/93	KFCB	0030	Didache -- Teachings of Christ
0800	05/20/93	KFCB	0030	Didache -- Teachings of Christ
0800	05/21/93	KFCB	0030	Didache -- Teachings of Christ
1730	05/20/93	KFCB	0030	Donald Whitaker
2200	05/16/93	KFCB	0030	Dwight Thompson
1700	05/17/93	KFCB	0030	E.V. Hill
2330	05/21/93	KFCB	0030	E.V. Hill
1730	05/18/93	KFCB	0030	Especially for You
2330	05/19/93	KFCB	0030	Especially for You
1930	05/20/93	KFCB	0030	Especially for You
1300	05/21/93	KFCB	0030	Especially for You
1530	05/18/93	KFCB	0030	Flying House
1530	05/20/93	KFCB	0030	Flying House
1800	05/16/93	KFCB	0030	Frederick K. Price
1600	05/22/93	KFCB	0030	Golf Dynamics
1700	05/20/93	KFCB	0030	Graham Kerr's Simply Marvellous
1100	05/22/93	KFCB	0030	Graham Kerr's Simply Marvellous
1630	05/18/93	KFCB	0030	Guidelines
1700	05/19/93	KFCB	0030	Hal Lindsey
0730	05/16/93	KFCB	0030	In Search of the Lord's Way
2100	05/16/93	KFCB	0030	In Touch
1400	05/16/93	KFCB	0030	Informed Viewer
1500	05/22/93	KFCB	0030	Informed Viewer
1600	05/17/93	KFCB	0030	Inspiration Time
1600	05/16/93	KFCB	0030	Irene Houston Ministries
1800	05/16/93	KFCB	0030	Jack Hayford
1300	05/20/93	KFCB	0030	Jack Van Impe
1900	05/22/93	KFCB	0030	Jack Van Impe
1900	05/16/93	KFCB	0030	James Kennedy
2100	05/21/93	KFCB	0030	James Kennedy
0930	05/17/93	KFCB	0030	James Robison
0930	05/18/93	KFCB	0030	James Robison
2100	05/18/93	KFCB	0030	James Robison
0930	05/19/93	KFCB	0030	James Robison
2130	05/20/93	KFCB	0030	James Robison
0930	05/21/93	KFCB	0030	James Robison
2130	05/17/93	KFCB	0030	Jerry Barnard
1600	05/21/93	KFCB	0030	Jerry Barnard
2300	05/22/93	KFCB	0030	Jerry Barnard
2330	05/16/93	KFCB	0030	Jessie Dixon
1300	05/19/93	KFCB	0030	Jessie Dixon
1530	05/16/93	KFCB	0030	Jewish Voice
1930	05/18/93	KFCB	0030	John Ankerberg
2030	05/22/93	KFCB	0030	John Ankerberg
1230	05/17/93	KFCB	0030	John Hagee Today
1230	05/18/93	KFCB	0030	John Hagee Today
1230	05/19/93	KFCB	0030	John Hagee Today
1230	05/20/93	KFCB	0030	John Hagee Today
1230	05/21/93	KFCB	0030	John Hagee Today
1500	05/19/93	KFCB	0030	Joy Junction
0700	05/22/93	KFCB	0030	Joy Junction
1300	05/22/93	KFCB	0030	Joy Junction
1500	05/20/93	KFCB	0030	Just Kids
2200	05/17/93	KFCB	0030	Kenneth Copeland
2200	05/18/93	KFCB	0030	Kenneth Copeland
2200	05/19/93	KFCB	0030	Kenneth Copeland
2200	05/20/93	KFCB	0030	Kenneth Copeland
0900	05/16/93	KFCB	0030	Kenny Foreman
1900	05/17/93	KFCB	0030	Kenny Foreman
2100	05/19/93	KFCB	0030	Kenny Foreman
1900	05/20/93	KFCB	0030	Kenny Foreman
1900	05/21/93	KFCB	0030	Kenny Foreman
1630	05/16/93	KFCB	0030	Key to the Kingdom
0700	05/16/93	KFCB	0030	King Is Coming
2000	05/22/93	KFCB	0030	King Is Coming
0700	05/19/93	KFCB	0030	Larry Lea
0700	05/21/93	KFCB	0030	Larry Lea
0630	05/17/93	KFCB	0030	Life Lessons
1330	05/17/93	KFCB	0030	Life Lessons
0000	05/18/93	KFCB	0030	Life Lessons
0630	05/18/93	KFCB	0030	Life Lessons
1330	05/18/93	KFCB	0030	Life Lessons
0000	05/19/93	KFCB	0030	Life Lessons
0630	05/19/93	KFCB	0030	Life Lessons
1330	05/19/93	KFCB	0030	Life Lessons
0000	05/20/93	KFCB	0030	Life Lessons

0630	05/20/93	KFCB	0030	Life Lessons
1330	05/20/93	KFCB	0030	Life Lessons
0000	05/21/93	KFCB	0030	Life Lessons
0630	05/21/93	KFCB	0030	Life Lessons
1330	05/21/93	KFCB	0030	Life Lessons
0000	05/22/93	KFCB	0030	Life Lessons
1730	05/21/93	KFCB	0030	Lifestyle Magazine
1130	05/22/93	KFCB	0030	Lifestyle Magazine
1730	05/17/93	KFCB	0030	Living Way
0800	05/16/93	KFCB	0030	Lloyd Ogilvie
11700	05/17/93	KFCB	0030	Music That Ministers
0000	05/16/93	KFCB	0030	New Beginnings
11700	05/21/93	KFCB	0100	Night Talk
0000	05/21/93	KFCB	0150	Night Talk
0000	05/22/93	KFCB	0100	Night Talk
0000	05/22/93	KFCB	0150	Night Talk
0000	05/22/93	KFCB	0030	Paid Program
0000	05/22/93	KFCB	0030	Paid Program
1630	05/22/93	KFCB	0030	Paid Program
0830	05/22/93	KFCB	0030	Paid Program
2100	05/20/93	KFCB	0030	Quigley's Village
1900	05/19/93	KFCB	0060	Reach Out and Touch Jesus
2130	05/22/93	KFCB	0060	Rejoice in the Lord
1100	05/16/93	KFCB	0060	Rejoice in the Lord
1730	05/16/93	KFCB	0030	Robert Schuller
1100	05/17/93	KFCB	0030	Ron Cottle
1100	05/18/93	KFCB	0030	Solo Act
1100	05/19/93	KFCB	0030	Southern Gospel Music
1100	05/20/93	KFCB	0030	Southern Gospel Music
1100	05/21/93	KFCB	0030	Southern Gospel Music
1500	05/18/93	KFCB	0030	Southern Gospel Music
1530	05/21/93	KFCB	0030	Sunshine Factory
1530	05/17/93	KFCB	0030	Super Book
1530	05/19/93	KFCB	0030	Superbook
1530	05/22/93	KFCB	0030	Superbook
1630	05/22/93	KFCB	0030	Superbook
1630	05/18/93	KFCB	0030	This Is the Life
2000	05/20/93	KFCB	0030	This Is the Life
1930	05/16/93	KFCB	0030	This Week in Bible Prophecy
2230	05/17/93	KFCB	0030	This Week in Bible Prophecy
2230	05/18/93	KFCB	0030	This Week in Bible Prophecy
2230	05/19/93	KFCB	0030	This Week in Bible Prophecy
2230	05/20/93	KFCB	0030	This Week in Bible Prophecy
2230	05/21/93	KFCB	0030	This Week in Bible Prophecy
2230	05/22/93	KFCB	0030	This Week in Bible Prophecy
0000	05/17/93	KFCB	0030	Today With Marilyn Hickey
0000	05/18/93	KFCB	0030	Today With Marilyn Hickey
0000	05/19/93	KFCB	0030	Today With Marilyn Hickey
0000	05/20/93	KFCB	0030	Today With Marilyn Hickey
1200	05/21/93	KFCB	0030	U.S. Farm Report
1330	05/22/93	KFCB	0030	Victorious Living
1620	05/17/93	KFCB	0030	Victory
1620	05/18/93	KFCB	0030	Victory
1620	05/18/93	KFCB	0030	Victory
1620	05/19/93	KFCB	0030	Victory
1620	05/20/93	KFCB	0030	Victory
1620	05/20/93	KFCB	0030	Victory
1620	05/21/93	KFCB	0030	Victory
1620	05/21/93	KFCB	0030	Victory
2230	05/16/93	KFCB	0030	WWOC Reverend Mark Filkey
1930	05/17/93	KFCB	0030	Witness
1930	05/22/93	KFCB	0030	Worth More Than a Million
1300	05/18/93	KFCB	0030	Zola Levitt
2100	05/18/93	KFCB	0030	Zola Levitt

APPENDIX B

1993

KLXV-TV65

2315 Canoas Garden Avenue
San Jose, CA 95125
408/264-6565
FAX: 408/723-1670

7/14/93
for to GF
Called Kurt Foreman to allegedly
negotiate. GF will respond.
RECEIVED
JL 13 1993
VIACOM S.F.

Via Federal Express

John Marx
General Manager
Viacom Cablevision - San Francisco
2055 Folsom Street
San Francisco, CA 94110

Dear Mr. Marx:

I am responding to a copy of letter I received from Mr. George Shapiro dated July 8, 1993 to Ronald Parver, Esq, Federal Communications Commission (see attached letter). The letter indicates that Viacom will not be adding KLXV-TV 65 to its channel line-up due to its preliminary findings that KLXV-TV 65 and KFCB-TV 42 are substantially duplicated under the Commission's standards for substantial duplication.

I am enclosing a copy of our July program schedule for your review along with an analysis of the duplication between KFCB-TV 42 and KLXV-TV 65 under the commission's rule of substantial duplication; two commercial stations substantially duplicate each other if they simultaneously broadcast identical programming more than 50% of the broadcast week. For this purpose, "identical programming" means the identical episode of the same program series. Putting KLXV-TV 65's program schedule under this rule renders it currently duplicating 37.60% of its' broadcast week, substantially below the 50% the commission considers duplicated. Given this information and that your system will be notifying your subscribers of the new changes within days, I request Viacom Cablevision to carry KLXV-TV 65 on its San Francisco system.

In the analysis enclosed, I have highlighted (bold) the programs which are duplicated. It is our intent upon contract negotiations with our programmers to diversify our programming further in the months ahead.

Thank you for your immediate attention to this matter and I look forward to working with your system.

Sincerely yours,



Kurt Foreman
General Manager

cc: Rev. Kenny Foreman, President

KLXV TV-65
Broadcast Schedule
July - 1993

PT	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
6:00					Joy		Buster's Barn
6:30	Christopher Close-up				Life Lessons		Davy and Goliath
7:00	Winning Walk	Choices We Face	Frank Waters	E.V. Hill	Myles Monroe	Larry Lee	Just Kids
7:30	In Search of the Lost Way			Victory with Mervin Corrallo			Captain Hook
8:00	Let God Love You			Bevity Exercise			Garber
8:30	Amazing Facts	Especially For You	Calling Dr. Whitehead	Apostle on Health	Music that Ministers	Celebrate Life	Outday's Village
9:00	Cathedral of			Today with Marilyn			Features
9:30	Faith Hour			James Flitton			International
10:00	The Living Way			'Today' with John Hayes			Kid's Club
10:30				Abundant			Features International
11:00	Hour of Power			Living			Act It Out
11:30				Benny Hinn			Josh McDowell
12:00	Cornerstone with John Hayes			Bountiful Blessings			Challenge America
12:30				Didache - Teachings of Christ			Walt Mills
1:00	Love Worth Finding			Coast to Coast			LifeStyle Magazine
1:30	The Informed Viewer	The Coral Ridge Hour	Love Worth Finding	The LIVING Way	In Touch	Rejoice in The Lord	Book on Course
2:00	Breath of the Spirit			KLXV Youth Jam			Mike Barber
2:30	Jewish Voice			Light Music			Informed Viewer
3:00	Faith Talk	Up on Melody Mt.	Date Events	Homeland Harmonies	Pat Boone	Rejoice in The Lord	Especially For You
3:30	Key to the Kingdom	Nancy Harmon	Walt Mills	Music that Ministers	Day of Discovery	Calloway/Jean Dixon	Vision Media
4:00	New Beginnings			Abundant			El Poco de Vida
4:30	God's Word of Ministry			Living			Buenas Nuevas
5:00	Ever Increasing Faith			The			Jerry Bernard
5:30				700 Club			Historical Living
6:00	The Coral Ridge Hour			Praise			Jack Van Impe
6:30	This Week in Bible Prophecy			The			More Than a Million
6:45	Breath of Life			Lord			The King Is Coming
7:00	In Tough	This Week in Bible Prophecy	Frank Waters	Cathedral of			John Ankerberg
7:30	Dwight Thompson			Faith Hour			Day of Discovery
8:00	Mark Fillier				Coast To Coast		Rejoice in the Lord
8:30	Carlton Pearson						This Week in Bible Prophecy
9:00				The Attention Times			Jerry Bernard
9:30				This Week in Bible Prophecy			Asst. with Destiny
10:00				Light Music			Value of God
10:30							

KLXV TV-65 July Schedule

Weekly Totals				
Total Broadcast Hours	129.00			
Hours of Duplication	48.50			
% of Duplication	37.00%			

PT	Monday	Tuesday	Wednesday	Thursday	Friday	Dup Hrs
9:00			Joy			
9:30			Life Lessons			2.50
7:00	Choices We Face	Brent Walters	E.V. Hill	Myles Monroe	Larry Lee	0.50
7:30			Morris Carullo			2.50
8:00			Beverly Exercises			
8:30	Especially For You	Dr. Whitaker	Accent on Health	Music that Ministers	Celebrate Life	
9:00			Today with Marilyn Hickey			2.50
9:30			James Robison			2.50
10:00			"Today" with John Hagee			
10:30			Abundant			
11:00			Living			
11:30			Benny Hinn			2.50
Noon			Bountiful Blessings			2.50
12:00			Didache - Teachings of Christ			
1:00			Coast to			
1:30			Coast			
2:00	The Coral Ridge	Love Worth	The Living	In	Rejoice in	
2:30	Hour	Finding	Way	Touch	The Lord	
3:00			KLXV Youth Jam			
3:30			Light Music			
4:00	Up on Melody Mountain	Dale Evans	Homeland Harmony	Pet Boone	Steve Brock	
4:30	Nancy Harmon	Walt Mills	Music that Ministers	Day of Discovery	Jeane Dixon	
5:00			Abundant			
5:30			Living			
6:00			The			2.60
6:30			700 Club			2.50
7:00			Praise			
7:30			The			
8:00			Lord			
8:30	Week in Prophecy		Cathedral of			0.50
9:00	Brent Walters		Faith Hour			0.60
10:00			Coast To			
10:30			Coast			
11:00			The American Times			
11:30			This Week in Bible Prophecy			
12:00			Light Music			
12:30						21.50

Weekday	
Broadcast Hours	92.50
Dup Hours	21.50
% Dup	23.24%

KLXV-TV 85 July Schedule

PST	Saturday	Sunday	Dup Hrs
6:00	Becky's Barn		
6:30	Davey & Goliath	Christopher Close-up	1
7:00	Just Kids	Ed Young	
7:30	Gerbert	In Search of the Lord's Way	0.5
8:00	Superbook	Lloyd Optive	0.5
8:30	Culpey's Village	Amazing Facts	0.5
9:00	Features	Cathedral of	1
9:30	International	Faith Hour	1
10:00	Kid's Club	Jack	0.5
10:30	Features International	Hayford	1
11:00	Act It	Hour of	0.5
11:30	Out	Power	0.5
Noon	Josh McDowell	Cornerstone with	0.5
12:30	Challenge America	John Hagee	0.5
1:00	Walt Mills	Love Worth	0.5
1:30	Lifestyle Magazine	Finding	0.5
2:00	Back On Course	The Informed	0.5
2:30	Mike Barber	Viewer	0.5
3:00	Informed	Breath of the Spirit	1
3:30	Viewer	Jewish Voice	1
4:00	Especially For You	Faith Talk	0.5
4:30	Vision Media	Key to the Kingdom	1
5:00	El Pan De Vida	New Beginnings	1
5:30	Buenas Nuevas	God's Word in Ministry	1
6:00	Jerry Bernard	Ever Increasing	0.5
6:30	Victorious Living	Faith	1
7:00	Jack Van Impe	The Coral Ridge	1
7:30	Worth More Than a Million	Hour	1
8:00	The King Is Coming	This Week in Bible Prophecy	1
8:30	John Ankerberg	Breath of Life	1
9:00	Day of Discovery	In	1
9:30	Rejoice In	Touch	1
10:00	the Lord	Dwight Thompson	1
10:30	This Week in Bible Prophecy	Mark Finley	1
11:00	Jerry Bernard	Carlton	1
11:30	Appt. with Destiny	Pearson	1
Mid	Voice of God		
12:30			27

Weekend
Broadcast Hours
Dup Hours
% Dup

36.5
27
79.67%

TV 42 PROGRAM SCHEDULE
July 1993

ON AIR	Program Description	Length (Minutes)
<input checked="" type="checkbox"/>	Family Favorites	15
<input checked="" type="checkbox"/>	Life Lessons	15
Mon 06/20	Adam on Health Children's Life Jerry Lee Don & Mary Jerry Lee	15
In Remembrance...	Morris Gentry	15
Lloyd Optics	Olderete - Teaching of Christ	15
Anselmo Perez	Beverly Exercises	15
Cathedral of Faith Hour	Today with Martha Hickey	15
Jack Hayford	James Robison	15
Hour of Power	Living Way	15
Conversation with John Hayes	Sensitivity for You Bob Art Dr. Whittaker Unscripted Barney Nine	15
Long Month Reading	The Witness Zeta Latin Beautiful Blessings John Hayes Today Jerry Lee Jerry Lee Life Lessons	15
Informal Visitor	Caret to Caret	15
Beneath the Spirit	Cate, Hank Family Jerry Lechner Jerry Stiles Barry & Pam Robert Flying Horse Rebirth Flying Horse Rebirth Informal Visitor	15
Joseph Hayes	Home Number Inspiration Time This is the Life Children's Life Age with Dignity Jerry Barrett This is the Life Key to the City Deep Theory Evolution Adam on Health Children We Play Unscripted Value Books	15
New Beginnings	EV. HILL Getting Over Hal Lindsey Heavy Metalheads Bob Art It's Never Too Late James Monroe Meeting Amer. Self Help The American Times	15
Don Williams	The 700 Club	15
Dr. James Hollingshead	Home Number Adam on Health Return to the How Can I Live? Cathedral of Faith Don Williams Family Prestigious John Autoburg Return to the How Can I Live? Cathedral of Faith Don Williams Family Programs	15
Doris of Life	Caret to Caret	15
In Town	Challenge America Zeta Latin Children of Faith How I Found Paul Mire Day of Discovery Jerry Barrett James Robison Flying Horse James Robison The Living Way Rebirth Value Books	15
Doris Thompson	Kennedy Organization	15
Mark Hwy	Morris Gentry	15
Oscar Perez	This Week in Black Prophecy	15
Adam on Health	Adam on Health Age with Dignity Sensitivity for You This is the Life EV. HILL Age with Dignity	15
Cathedral of Faith Hour	Life Lessons	15
ON AIR	Major Talk - 12:00am - Sunday "The Art of Self Training" only	15

Closed Caption
Program Schedule Subject to Change